

Ahilan T. Arulanantham (SBN 237841)
arulanantham@law.ucla.edu
CENTER FOR IMMIGRATION LAW AND
POLICY, UCLA SCHOOL OF LAW
385 Charles E. Young Dr. East
Los Angeles, CA 90095
Telephone: (310) 825-1029

Emilou MacLean (SBN 319071)
emaclean@aclunc.org
Michelle (Minju) Y. Cho (SBN 321939)
mcho@aclunc.org
Amanda Young (SBN 359753)
ayoung@aclunc.org
ACLU FOUNDATION
OF NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111-4805
Telephone: (415) 621-2493
Facsimile: (415) 863-7832

Attorneys for Plaintiffs
[Additional Counsel Listed on Next Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS
MOLINA, JHONY SILVA, MARIA ELENA
HERNANDEZ, O.C., SANDHYA LAMA,
S.K., TEOFILO MARTINEZ,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-05687-TLT

**PLAINTIFFS' UNOPPOSED
ADMINISTRATIVE MOTION TO ADD
CLASS COUNSEL**

Assigned to: Hon. Trina L Thompson

Complaint Filed: July 7, 2025

1 Additional Counsel for Plaintiffs

2 Jessica Karp Bansal (SBN 277347)

3 jessica@ndlon.org

4 Lauren Michel Wilfong (Admitted *Pro Hac Vice*)

5 lwilfong@ndlon.org

6 NATIONAL DAY LABORER ORGANIZING NETWORK

7 1030 S. Arroyo Parkway, Suite 106

8 Pasadena, CA 91105

9 Telephone: (626) 214-5689

10 Eva L. Bitrán (SBN 302081)

11 ebitran@aclusocal.org

12 Diana Sánchez

13 dianasanchez@aclusocal.org

14 ACLU FOUNDATION

15 OF SOUTHERN CALIFORNIA

16 1313 West 8th Street

17 Los Angeles, CA 90017

18 Telephone: (213) 977-5236

19 Erik Crew (Admitted *Pro Hac Vice*)

20 ecrew@haitianbridge.org

21 HAITIAN BRIDGE ALLIANCE

22 4560 Alvarado Canyon Road, Suite 1H

23 San Diego, CA 92120

24 Telephone: (949) 603-7411

1 Plaintiffs respectfully submit this unopposed motion to add Lauren Michel Wilfong as class
 2 counsel for Plaintiff Class. Good cause exists for this request, and Mx. Wilfong satisfies the
 3 requirements to represent the class under Federal Rule of Civil Procedure 23(g).

4 On October 2, 2025, this Court granted Plaintiffs' motion for class certification. Dkt. 134.
 5 The Court ordered that Ahilan Arulanantham be appointed as lead class counsel, and that Emilou
 6 MacLean, Eva Bitrán, Michelle, (Minju) Y. Cho, Diana Sánchez, Amanda Young, Jessica Karp
 7 Bansal, and Erik Crew be appointed as class co-counsel. *Id.* at 24-26, 29. Mx. Wilfong argued the
 8 class certification motion for Plaintiffs along with Ms. MacLean and Mx. Wilfong's qualifications
 9 are listed in the record at Dkt. 89-1 ¶¶9-12. *See also* Dkt. 89 at 12 (requesting appointment of
 10 undersigned counsel, including Mx. Wilfong, as class counsel). Plaintiffs believe the omission of
 11 Mx. Wilfong from the Court's order appointing class counsel may be due to Plaintiffs' own
 12 inadvertent oversight in omitting Mx. Wilfong from the proposed order submitted in support of
 13 Plaintiffs' motion for class certification. *See* Dkt. 89-5. Plaintiffs sincerely apologize to the Court for
 14 this error and respectfully request that the Court appoint Lauren Michel Wilfong as class co-counsel
 15 in this matter. Defendants do not oppose this request.

16 Date: October 10, 2025

17 Respectfully submitted,

18 NATIONAL DAY LABORER
 19 ORGANIZING NETWORK

20 /s/ Jessica Karp Bansal

21 Jessica Karp Bansal
 22 Lauren Michel Wilfong
 (Admitted *Pro Hac Vice*)

23 Ahilan T. Arulanantham
 24 CENTER FOR IMMIGRATION LAW AND
 POLICY, UCLA SCHOOL OF LAW

25 Eva L. Bitrán
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Emilou MacLean
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OF NORTHERN CALIFORNIA

Erik Crew (Admitted *Pro Hac Vice*)
HAITIAN BRIDGE ALLIANCE

Attorneys for Plaintiffs